

DISCOVERY PLAN WORKSHEET

(Please be advised that the Court's Individual Rules include additional forms to be used in cases involving claims of adverse employment or FLSA violations.)

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations: _____ N/A _____

Completion date for Phase I Discovery
as agreed upon by the parties: _____ N/A _____
*(Reciprocal and agreed upon document production,
generally not including depositions, unless otherwise agreed.
No more than 30 days after Initial Conference)*

Status conference TBD by the court:
(Generally 15 days post Tier I Discovery) _____

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: _____ 8/15/20 _____
(Presumptively 15 days post status conference)

First requests for production of documents
and for interrogatories due by: _____ 8/31/20 _____
(Presumptively 15 days post joining/amending)

All fact discovery completed by: _____ 12/15/20 _____
*(Presumptively 3.5 months post first
requests for documents/interrogatories)*

Exchange of expert reports completed by: Plaintiff to submit its report by 1/15/21
(Presumptively 30 days post fact discovery) Defendants to submit their report by 2/15/21

Expert depositions completed by: _____ 3/15/21 _____
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice: _____ 5/15/21 _____
*(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)*

COMPLETION OF ALL DISCOVERY BY:

(Note: Presumptively 9 months after Initial Conference.)

Submission of joint pre-trial order: _____ 4/15/21 _____
Final Pre-Trial Conference TBD by the court: _____